

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 3:22CR274
)
Plaintiff,) JUDGE JAMES R. KNEPP, II
)
v.)
)
AMANDA HOVANEC, et al.,) GOVERNMENT'S REQUEST FOR
) DISCOVERY
Defendants.)

Now comes the United States of America, by and through undersigned counsel, and formally requests discovery pursuant to Fed. R. Crim. P. 16(b). Specifically, the government requests disclosure of the following information:

(A) Documents and Objects. Inspection and copies of books, papers, documents, data, photographs, tangible objects, buildings or places, or copies or portions of any of these items if:

- (i)** the item is within the defendant's possession, custody, or control; and
- (ii)** the defendant intends to use the item in the defendant's case-in-chief at trial.

(B) Reports of Examinations and Tests. Inspection and copies of the results or reports of any physical or mental examination and of any scientific test or experiment if:

- (i)** the item is within the defendant's possession, custody, or control; and
- (ii)** the defendant intends to use the item in the defendant's case-in-chief at trial, or intends to call the witness who prepared the report and the report relates to the witness's testimony.

(C) Expert Witnesses. The name(s) of any expert witness the defendant intends to use under Federal Rule of Evidence 702, 703 or 705 during the defendant's case-in-chief at trial as well as the following information about the expert(s):

- (i) a complete statement of all opinions that the defendant will elicit from the witness in the defendant's case-in-chief;
- (ii) the bases and reasons for them;
- (iii) the witness's qualifications, including a list of all publications authored in the previous 10 years; and
- (iv) a list of all other cases in which, during the previous 4 years, the witness has testified as an expert at trial or by deposition.

Respectfully submitted,

REBECCA C. LUTZKO
United States Attorney

By: /s/ Alissa M. Sterling
Alissa M. Sterling (OH 0070056)
Assistant United States Attorney
Four SeaGate, Suite 308
Toledo, Ohio 43604
Tel. No.: (419) 259-6376
E-Mail: Alissa.Sterling@usdoj.gov

/s/ Michelle M. Baeppler
Michelle M. Baeppler (OH: 0065378)
Assistant United States Attorney
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, OH 44113
Tel. No.: (216) 622-3995
Michelle.Baeppler@usdoj.gov